



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 30, 2016

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2016 ETC Annual Report of Valley Telephone Cooperative, Inc. (TX)
Study Area Code 442159**

Dear Ms. Dortch:

On behalf of Valley Telephone Cooperative, Inc. (TX) ("Company"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the Company's Progress Report on its Five-Year Service Quality Improvement Plan and of outage reporting as required by Section 54.313.³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313.



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June 30, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2016 ETC Annual Report of Valley Telephone Cooperative, Inc. (TX)
Study Area Code 442159
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Valley Telephone Cooperative, Inc. (TX) (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ withholding from public inspection certain information contained in attachments to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment are attachments to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
2. Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission a Five-Year Service Quality Improvement Plan ("Five-Year Plan") Progress Report⁴ and must also report outages, both of which are contained in attachments to the 2016 Report.
3. The information contained in attachments for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. The Company also seeks withholding from public inspection data pertaining to the Company's outages provided at FCC Form 481 Line 200 attachment, Service Outage Reporting. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

4. With respect to identifying the degree to which the Five-Year Plan concerns a service that is subject to competition, the Line 112 attachment contains information of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment includes competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

With respect to identifying the degree to which the outage data contained in the Line 200 attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.

5. With respect to identifying possible exposure to competitive harm, the information contained in the subject attachments is information that is not customarily released to the public. The Five-Year Plan information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachments, the Company is filing

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

Request for Confidentiality

Page 3

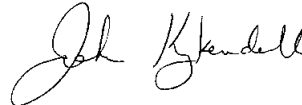
the Five-Year Plan and outage attachments under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.⁶ The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment, and to the Company's outage data provided at FCC Form 481 Line 200 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

⁶ See *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 04-188, rel. Aug. 19, 2004, para. 45.

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name: Person USAC should contact with questions about this data	Paula Smith
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address: Email of the person identified in data line <030>	paula.smith@vtxl.net

Form Type	54.313 and 54.422
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**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	
<111>	year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

442159tx112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Yes

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(200) Service Outage Reporting (Voice)

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

<210> For the prior calendar year, were there any reportable voice service outages? Yes

[illegible]

**(300) Unfulfilled Service Request
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

(500) Compliance With Service Quality Standards and Consumer Protection Rules		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
442159tx510.pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	

(600) Functionality in Emergency Situations Data Collection Form		REDACTED FOR PUBLIC INSPECTION	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	442159tx610.pdf

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**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

<701> Residential Local Service Charge Effective Date

1/1/2016

<702> Single State-wide Residential Local Service Charge

[illegible]

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(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

[illegible]

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(800) Operating Companies Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net
<810>	Reporting Carrier	Valley Telephone Cooperative, Inc.
<811>	Holding Company	Not Applicable
<812>	Operating Company	Valley Telephone Cooperative, Inc.

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<900>	Does the filing entity offer tribal land services? (Y/N)	No
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If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

[illegible]

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP ~TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtxl.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtxl.net

442159tx1210.pdf

Name of Attached Document

<1220> Link to Public Website HTTP www.vtxl.net

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010>	2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support			
<2011>	3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support			
<2022>	Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.			
<2023>	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.			
<2024A>	Round 2 Recipient of Incremental Support?			
<2024B>	Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.	Name of Attached Document Listing Required Information		
<2025A>	Round 1 or Round 2 Recipient of Incremental Support?			
<2025B>	Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-	Name of Attached Document Listing Required Information		
<2015>	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)			

(2000) Price Cap Carrier Additional Documentation (Continued)

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

Name of Attached Document Listing
Required Information

cap carrier used for capital expenditures in 2015.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

(3005) Rate Of Return Carrier Additional Documentation
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtxl.net

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}	Yes - Attach Certification	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	442159tx3010.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3015)	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input checked="" type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	442159tx3017.pdf
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input type="radio"/>
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input type="checkbox"/>
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

(4005) Rural Broadband Experiment Additional Documentation
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtxl.net

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
--	--	--

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
---	--	--

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
---	--	--

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	442159
<015> Study Area Name	VALLEY TEL CO-OP -TX
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Paula Smith
<035> Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039> Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: VALLEY TEL CO-OP -TX	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/27/2016
Printed name of Authorized Officer: David Osborn	
Title or position of Authorized Officer: CEO	
Telephone number of Authorized Officer: 9566421124 ext.124	
Study Area Code of Reporting Carrier: 442159	Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	442159
<015> Study Area Name	VALLEY TEL CO-OP -TX
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Paula Smith
<035> Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039> Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer: ext .	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent	
Telephone number of Authorized Agent or Employee of Agent: ext .	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

**Five-Year Network Improvement Plan and
Progress Report**

ATTACHMENT REDACTED IN ENTIRETY

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
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<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

<210> For the prior calendar year, were there any reportable voice service outages?

Yes

<220>

<a>	<b1>	<b2>	<b3>	<b4>	<c1>	<c2>	<d>	<e>	<f>	<g>	<h>
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[illegible]

Valley Telephone Cooperative, LLC

Study Area Code: 442159

Response to Line 510 - Service Quality Standards and Consumer Protection Rules

Compliance – Voice and Broadband

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Valley Telephone Cooperative, LLC (“Cooperative”) hereby certifies that its voice service complies with applicable service quality standards and consumer protection rules under the Texas Administrative Code, Title 16, Part II, as established by the Public Utility Commission of Texas. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff which discloses rates, terms and conditions of service to customers pursuant to Subchapter J requirements in Sections 26.201-26.230; (2) adherence to state consumer protection requirements governing telephone providers as identified in Subchapter B, in Sections 26.21-

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

26.37; and (3) service quality standards requirements as identified in Subchapter C, Sections 26.51 -26.57. In addition, the Cooperative complies with numerous federal consumer protection standards including, but not limited to: (1) Truth-in-Billing Rules outlined in 47 CFR § 64.2401; and (2) compliance with Federal CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

For its broadband service, Cooperative hereby certifies that while there are no applicable state broadband service quality standards and consumer protection rules yet established under the Texas Administrative Code by the Public Utility Commission of Texas, the Cooperative discloses rates, terms and conditions on its public web site and the Cooperative complies with applicable federal and state customer protection standards generally applicable to all businesses operating in Texas. In addition, the Cooperative adheres to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order*, as it applies to the Company.

VALLEY TELEPHONE COOPERATIVE, INC.

Annual § 54.313 Report of High-Cost Recipient

Current Ability to Remain Functional in Emergency Situations

In accordance with § 54.313 (a)(6), Valley Telephone Cooperative, Inc.'s network has the following safeguards built in to ensure provision of telephone service during emergency situations:

Back-up Power –

All remotes (building and cabinets) within the Valley Telephone Cooperative, Inc. network are monitored by the Network Operations Center on a 365 days a year; 24 hours a day basis.

Switches – stand alone and/or host:

All Switches in Network are located in permanent buildings with DC battery capacity and generators powered by diesel fuel. Every location has enough battery capacity for a minimum of 8 hours of power and diesel fuel to power the on-site generator for a minimum of 24 consecutive hours. Many of the larger sites have capacity of 48 hours for diesel fuel. Generator testing and diesel fuel status is checked weekly for all sites in the network.

Remote Central Offices:

Same as above for all buildings whether it is a remote or main site.

Subscriber carrier (DLC, AFC, OPM, etc.):

All remote DLC sites that are in stand-alone cabinets have at least 6 hours of continuous battery life in the event of an outage. All remote cabinets have portable generator hookups in the case power is out long enough to drain the batteries. There are over 150 remotes with the Valley Telephone Cooperative, Inc. network.

Network Interface Devices (NIDs):

Valley Telephone Cooperative, Inc. serves some customers with metallic (copper) connections to the Central Office and the NID does not require any power for operation.

Valley Telephone Cooperative, Inc. has other customers served by non-metallic (fiber optic) connections to the Central Office. These customers' fiber NIDs are battery powered in case of emergency. The batteries are rated to last a minimum of 24 hours with no use of the NID and 8 hours with constant use. Tests have been conducted in-house to confirm this.

Current Ability to Remain Functional in Emergency Situations (continued)

Ability to reroute traffic around damaged facilities:

Valley Telephone Cooperative, Inc. has built redundant facilities between its exchanges and / or to its connecting company / toll tandem. These redundant facilities are in the form of SONET rings and redundant Ethernet transport with alternate physical facilities and meet points between VTX Telecom, AT&T, and Verizon, its interconnection to the Public Switched Telephone Network.

Capability to manage traffic spikes resulting from emergency situations:

Valley Telephone Cooperative, Inc. has sufficient switching and transport capacity to manage traffic spikes resulting from emergency situations. Valley Telephone Cooperative, Inc. takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations.

REDACTED FOR PUBLIC INSPECTION

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

<701> Residential Local Service Charge Effective Date

1/1/2016

<702> Single State-wide Residential Local Service Charge

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
TX	Annarose		FR	23.5	0.0	0.78	0.0	24.28
TX	Artesia Wells		FR	23.5	0.0	0.78	0.0	24.28
TX	Concepcion		FR	23.5	0.0	0.78	0.0	24.28
TX	El Sauz		FR	23.5	0.0	0.78	0.0	24.28
TX	Encino		FR	23.5	0.0	0.78	0.0	24.28
TX	Fowlerton		FR	23.5	0.0	0.78	0.0	24.28
TX	Hargill		FR	23.5	0.0	0.78	0.0	24.28
TX	Lasara		FR	23.5	0.0	0.78	0.0	24.28
TX	McCook		FR	23.5	0.0	0.78	0.0	24.28
TX	Millet		FR	23.5	0.0	0.78	0.0	24.28
TX	Mirando City		FR	23.5	0.0	0.78	0.0	24.28
TX	Port Mansfield		FR	23.5	0.0	0.78	0.0	24.28
TX	San Isidro		FR	23.5	0.0	0.78	0.0	24.28
TX	San Miguel		FR	23.5	0.0	0.78	0.0	24.28
TX	San Perlita		FR	23.5	0.0	0.78	0.0	24.28
TX	Stillman		FR	23.5	0.0	0.78	0.0	24.28
TX	Tilden		FR	23.5	0.0	0.78	0.0	24.28

REDACTED FOR PUBLIC INSPECTION

**(710) Broadband Price Offerings
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
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<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	TX	Annarose	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Artesia Wells	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Concepcion	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	El Sauz	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Encino	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Fowlerton	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Hargill	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Lasara	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	McCook	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Millet	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Mriando City	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Port Mansfield	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	San Isidro	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	San Miguel	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	San Perlita	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Stillman	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Tilden	42.95	0.0	42.95	6.0	3.0	999999	Other, N/A
	TX	Annarose	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Artesia Wells	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Concepcion	61.95	0.0	61.95	1.0	5.0	999999	Other, N/A
	TX	El Sauz	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A

REDACTED FOR PUBLIC INSPECTION

**(710) Broadband Price Offerings
Data Collection Form**

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<010>	Study Area Code	442159
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<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	TX	Encino	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Fowlerton	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Hargill	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Lasara	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	McCook	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Millet	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Mirando City	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Port Mansfield	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	San Isidro	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	San Miguel	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	San Perlita	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Stillman	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Tilden	61.95	0.0	61.95	10.0	5.0	999999	Other, N/A
	TX	Annarose	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Artesia Wells	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Concepcion	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	El Sauz	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Encino	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Fowlerton	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Hargill	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Lasara	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A

REDACTED FOR PUBLIC INSPECTION

**(710) Broadband Price Offerings
Data Collection Form**

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OMB Control No. 3060-0986/OMB Control No. 3060-0819
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<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	TX	McCook	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Millet	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Mirando City	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Port Mansfield	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	San Isidro	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	San Miguel	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	San Perlita	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Stillman	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Tilden	99.95	0.0	99.95	15.0	3.0	999999	Other, N/A
	TX	Annarose	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Artesia Wells	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Concepcion	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	El Sauz	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Encino	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Fowlerton	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Hargill	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Lasara	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	McCook	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Millet	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Mirando City	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A
	TX	Port Mansfield	199.95	0.0	199.95	50.0	25.0	999999	Other, N/A

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtx1.net

<711>

[illegible]

REDACTED FOR PUBLIC INSPECTION

(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	442159
<015>	Study Area Name	VALLEY TEL CO-OP -TX
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Paula Smith
<035>	Contact Telephone Number - Number of person identified in data line <030>	9566421194 ext.194
<039>	Contact Email Address - Email Address of person identified in data line <030>	paula.smith@vtxl.net
<810>	Reporting Carrier	Valley Telephone Cooperative, Inc.
<811>	Holding Company	Not Applicable
<812>	Operating Company	Valley Telephone Cooperative, Inc.

[illegible]

Valley Telephone Cooperative, Inc.

Rates, Terms and Conditions for Lifeline Service

(Response to Form 481, Line 1210)

Local exchange service rates and charges as specified below are for basic local exchange service, including Tone Dialing Service, and facilities only. The rates for other ancillary services not specifically shown below are presented in Valley Telephone Cooperative's tariff(s) on file with the Public Utility Commission of Texas. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

Residential Local Exchange Access Line Rates⁽¹⁾⁽²⁾:

Exchange Name	R-1 Rate
Annarose	\$23.50
Artesia Wells	\$23.50
Concepcion	\$23.50
El Sauz	\$23.50
Encino	\$23.50
Fowlerton	\$23.50
Hargill	\$23.50
Lasara	\$23.50
McCook	\$23.50
Millet	\$23.50
Mirando City	\$23.50
Port Mansfield	\$23.50
San Isidro	\$23.50
San Miguel	\$23.50
San Perlita	\$23.50
Stillman	\$23.50
Tilden	\$23.50

(1) Above listed fees do not include mandatory taxes, fees and surcharges, including, but not limited to Texas Universal Service Fund charges, 9-1-1 fees, and municipal franchise fees.

(2) Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

LOCAL EXCHANGE RATES AND SERVICES

VI. LIFELINE PROGRAM

The Lifeline Program is a retail local service offering designed to make telephone service available at reduced rates to qualifying low-income customers.

A. General

Consumers qualifying for Lifeline Service are offered the services or functionalities enumerated in 47 Code of Federal Regulation §54.101 (relating to Supported Services for Rural, Insular and High-Cost Areas).

1. The Cooperative shall offer toll restriction at no charge to all qualifying low-income consumers at the time such consumers subscribe to Lifeline Service. If the consumer elects to receive toll restriction, that service shall become part of the consumer's Lifeline Service.
2. A customer otherwise eligible to receive the Lifeline Service shall not be prohibited from obtaining and using telecommunications equipment and services designed to aid such customer in utilizing qualifying telecommunications services.
3. Lifeline Service rate reductions only apply to basic service and do not apply to non-basic services such as long distance service, which may or may not be tariffed. Customers may subscribe to non-basic services, including bundled services where available, at their discretion, although the Lifeline Service reduction only applies to the basic service charge in the bundled service.
4. The Lifeline Service rate reductions do not apply to service connection charges as set forth in Section 5 of this tariff.
5. Lifeline Service will not be available on a retroactive basis except as directed by Low income Discount Administrator or the Commission.
6. The Cooperative will waive monthly number portability charges, subject to its tariff, for the Lifeline customer.

LOCAL EXCHANGE RATES AND SERVICES

VI. LIFELINE PROGRAM (Continued)

The Lifeline Program is retail local service offering designed to make telephone service available at reduced rates to qualifying low-income customers.

B. Eligibility Requirements

1. The discounted service will be provided for one residential telephone line per household, at the subscriber's principal place of residence.
2. The applicant must certify that their annual household income is at or below 150% of the federal poverty guidelines, be an eligible resident of Tribal lands, or participate in, or have a person or child who resides in the customer household who participates in a program identified in Chapter 47 of Federal Regulations §54.409 and in P.U.C. Substantive Rule §26.412 regarding consumer qualification for Lifeline.
3. Procedures for Establishing Lifeline Discounts
 - a. Consumers within the Cooperative's service area identified as eligible for Lifeline Service by the Texas Low-Income Discount Administrator (LIDA) through the automatic enrollment process under Commission Substantive Rule §26.412, shall be provided Lifeline Service discounts, unless the Cooperative receives a customer request to be excluded from such discounts.
 - b. The LIDA shall provide the Cooperative with an initial list of consumer eligible for Lifeline Service and shall provide an updated list to the Cooperative on a monthly basis.
 - c. Consumers who do not participate in one of the designated programs but who meet income qualifications having an income at or below 150% of the federal poverty guidelines, may establish eligibility for Lifeline Service by contacting the LIDA and receive Lifeline Service discounts within 30 days of proof of eligibility.

LOCAL EXCHANGE RATES AND SERVICES

VI. LIFELINE PROGRAM (Continued)

B. Eligibility Requirements (Continued)

3. Procedures for Establishing Lifeline Discounts (Continued)

- d. The discontinuance of the Tel-Assistance program effective September 1, 2001 allows the Cooperative to move a Tel-Assistance customer to Lifeline Service.

4. Provision of Service

- a. The Cooperative shall provide Lifeline Service to all eligible consumers identified by the LIDA within its service area if the consumer is a customer of the Cooperative. Within 30 days after receipt of the list, the Cooperative shall begin reduced billing for eligible low-income consumer subscribing to qualifying services.
- b. If the eligible consumer changes the telephone service to qualifying services or initiates new qualifying service, the Cooperative shall begin reduced billing at the time the change of service becomes effective or at the time the new service is established.
- c. The Cooperative will discontinue Lifeline Service discounts upon notice by the LIDA that a customer is no longer eligible.
- d. The Cooperative has provided a confidentiality agreement to the LIDA providing Lifeline Service specifying the use of confidential client information is solely for providing Lifeline Service.

C. Deposit Requirements

The deposit requirement will be waived for Lifeline Service applicants who voluntarily elect to subscribe to Toll Restriction Service.

LOCAL EXCHANGE RATES AND SERVICES

VI. LIFELINE PROGRAM (Continued)

The Lifeline Program is retail local service offering designed to make telephone service available at reduced rates to qualifying low-income customers.

D. Lifeline Service Discounts

1. Eligible consumers who subscribe to Lifeline Service will receive the following discounts:
 - a. Federal Lifeline support amount. The Cooperative shall grant qualifying low-income consumer's support of \$9.25 per month or equal to the support amount as directed by the Federal Communications Commission in Chapter 47 of the Code of Federal Regulations regarding Lifeline Support.
 - b. State Support Amount. The Cooperative shall grant qualifying low-income consumers the state-approved reduction of up to \$3.50 in the monthly amount of intrastate charges due.

E. Service Charges

1. Service Charges do not apply when eligible customers with existing residential service convert to Lifeline Service.
2. Service Charges apply when:
 - a. At the time Lifeline Service billing is initiated, where existing eligible residential local exchange access service customers request additional features, such as special or custom calling features.
 - b. A customer receiving Lifeline Service voluntarily elects to convert to telephone service arrangement which preclude Lifeline Service eligibility.
 - c. New residential applicants (those without existing local exchange access service) eligible for the Lifeline Program will be subject to applicable service charges as specified in Section 5 of this tariff.
3. Any subsequent moves or changes after the initial connection to Lifeline Service will be subject to applicable service charges.

F. Payments and Disconnection of Service

1. The Cooperative may not disconnect Lifeline Service for nonpayment of toll charges.
2. A Lifeline customer is required to adhere to the same bill payment policies applicable to all of the Cooperative's customers.

Valley Telephone Cooperative, Inc. (SAC 442159)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Valley Telephone Cooperative, Inc. hereby certifies that throughout 2015, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, the Company offers broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream.

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY